Storm Water Pollution Prevention Plan

Virginia Pollutant Discharge Elimination System Permit #VA0024457

National Aeronautics and Space Administration Goddard Space Flight Center Wallops Flight Facility Wallops Island, Virginia



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THIS REVISION SUPERSEDES ALL PREVIOUS EDITIONS OF THE WALLOPS FLIGHT FACILITY STORM WATER POLLUTION PREVENTION PLAN

March 2005

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List of Acronyms

AAOC Administrative Agreement on Consent ADAS Advanced Data Acquisition Support

AFTF Aviation Fuel Tank Farm

AOC Area of Concern

AST Aboveground Storage Tank
BMP Best Management Practice
BOD Biological Oxygen Demand

BTEX Benzene, Toluene, Ethylbenzene, and Xylene

CAP Corrective Action Plan

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CSCE Comprehensive Site Compliance Evaluation

DCR (Virginia) Department of Conservation and Recreation

DEQ (Virginia) Department of Environmental Quality

DMR Discharge Monitoring Report
DoD Department of Defense
DRO Diesel Range Organics

EPA (United States) Environmental Protection Agency

FFTA Former Fire Training Area
FMB Facilities Management Branch
FOTW Federally Owned Treatment Works

FS Feasibility Study

FUDS Formerly Utilized Defense Site
GRO Gasoline Range Organics
GSFC Goddard Space Flight Center

HAZWOPER Hazardous Waste Operations and Emergency Response

ICP Integrated Contingency Plan

JP Jet Propulsion Fuel

JPTS Jet Propulsion Fuel, Thermally Stable

MDL Method Detection LimitMGD Million Gallons per DayMSDS Material Safety Data Sheet

NASA
National Aeronautics and Space Administration
NOAA
National Oceanic and Atmospheric Administration
NPDES
National Pollutant Discharge Elimination System
OCCUPATIONAL OCC

PCB Polychlorinated biphenyl PID Photoionization Detector

ppm Parts per Million

QA/QC Quality Assurance/Quality Control

RCRA Resource Conservation and Recovery Act

RI Remedial Investigation

SIC Standardized Industrial Classification

SPCC Spill Prevention, Control, and Countermeasures

List of Acronyms

SVOCSemi-volatile Organic CompoundsSWCB(Virginia) State Water Control BoardSWP3Storm Water Pollution Prevention PlanSWPPTStorm Water Pollution Prevention Team

TPH Total Petroleum Hydrocarbon
TSS Total Suspended Solids

USACE United States Army Corps of Engineers USFWS United States Fish and Wildlife Service

VAC Volatile Organic Compounds

Underground Storage Tank
Virginia Administrative Code
Volatile Organic Compounds

VPDES Virginia Pollutant Discharge Elimination System VSMP Virginia Storm Water Management Program

WFF Wallops Flight Facility
WOD Waste Oil Dump

WWTP (Old) Waste Water Treatment Plant

1.0 PURPOSE

The purpose of this Storm Water Pollution Prevention Plan (SWP3) is to meet the requirements of the National Aeronautics and Space Administration (NASA) Goddard Space Flight Center's Wallops Flight Facility's (WFF's) current Virginia Pollutant Discharge Elimination System (VPDES) permit #VA0024457, dated August 18, 2004. This document is intended to describe current storm water management and to reflect revisions to storm water management systems and the associated outfalls from the previous edition of the WFF SWP3, dated January 2001. Through the use of best management practices, regular inspections, and personnel training, WFF remains proactive in storm water pollution prevention.

This SWP3 is a dynamic document that is revised as appropriate to reflect changes in WFF operations. More specifically, this SWP3 is updated whenever there is a change in design, construction, operation, or maintenance that presents the potential for discharge of pollutants to waters of the Commonwealth of Virginia. This SWP3 is also be amended if it proves to be ineffective in eliminating or minimizing pollutants.

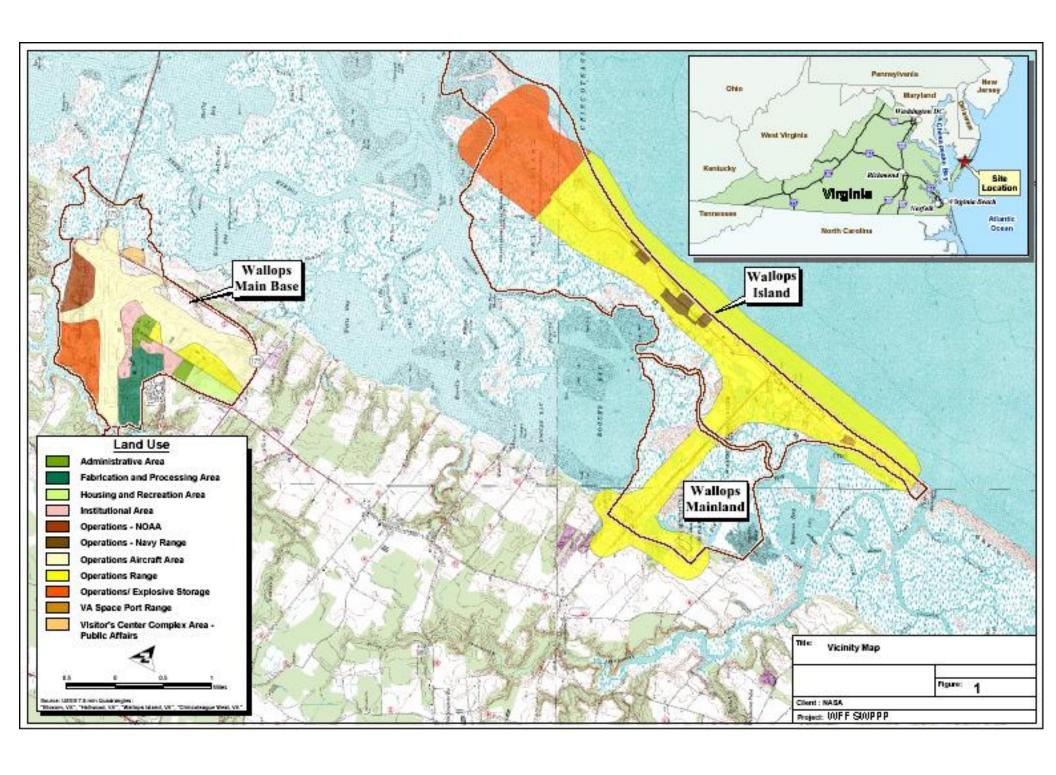
This SWP3 not only stands alone but is also a part of WFF's Integrated Contingency Plan (ICP). The ICP is an EPA mandated document, which details a facility's preparedness and responses to emergencies particularly to hazardous waste and fuel oil spills. The ICP was prepared for WFF in order to combine Spill Prevention, Control, and Countermeasures (SPCC) and Hazardous Waste Contingency plans and is in compliance with 9 VAC 25-91-10 Aboveground Storage Tank (AST) Pollution Prevention regulations.

1.1 Introduction

Wallops Flight Facility is located in Accomack County, Virginia within the area known as the Delmarva Peninsula. The facility consists of three separate landmasses in close proximity to each other: the Main Base, the Mainland, and Wallops Island, which total approximately 6,530 acres (2,643 hectares). Figure 1 depicts the location of the WFF and delineates the areas of the three landmasses with their associated land uses.

The Main Base is composed of approximately 2,230 acres (902.5 hectares). It is bordered on the east by extensive marshland, swales, and tidal creeks, which lead into Chincoteague Bay and Chincoteague Inlet. The Main Base is bordered on the north and west by an estuarine area known as Little Mosquito Creek. State Routes 175 and 798 border the remainder of the Main Base to the south and southeast, respectively.

Wallops Island is approximately 7 miles (11.3 kilometers) long, 1/2 mile (0.8 kilometers) wide, and is surrounded by water. It is comprised of approximately 4,200 acres (1,700 hectares), including the marsh area. Chincoteague Inlet borders Wallops Island on the north and the Atlantic Ocean forms the eastern border. Marshland covers the entire western approach to Wallops Island. The marsh area is interlaced with small tidal creeks and is bisected by the Virginia Inside Passage.



The Mainland area is bordered by extensive marshland and swales to the east and by private lands, currently used for agricultural and livestock (poultry house) operations, to the south, west, and north. The Mainland covers approximately 100 acres (40.5 hectares).

2.0 STORM WATER POLLUTION PREVENTION TEAM

The WFF has established a Storm Water Pollution Prevention Team (SWPPT) comprised of individuals from various NASA and partner organizations. The Team is responsible for the following:

- Implementing all VPDES and SWP3 requirements.
- Defining and agreeing upon an appropriate set of goals for the facility's storm water management program.
- Being aware of any changes in WFF or partner operations in order to determine changes (if needed) in the SWP3.
- Assigning both the Comprehensive Site Compliance Evaluation detailed in Section 5.0 of this Plan, and the review of the Fire Department's Incident Reports.
- Identifying pollutant sources and risks. Making decisions on appropriate best management practices (BMPs), and directing the actual implementation of the BMPs and regular evaluations to measure the effectiveness of the Plan.
- Developing, documenting, and implementing improved management practices to reduce the potential for contamination of storm water discharges.

The SWPPT meets at least annually to discuss the goals of the SWP3, review BMP progress, address comments and suggestions received from others, and determine if changes are necessary. The Team revises the SWP3, including the BMP implementation schedule, as necessary.

An Environmental Protection Specialist from the Wallops Environmental Office is the coordinator of the SWPP Team. This coordinator is also the backup facilitator for the timely cleanup of spills at the WFF. The Environmental Office maintains this SWP3, provides facility-wide annual training in the use of the SWP3, and conducts permit required inspections. The Chemistry Laboratory performs permit required chemical analyses on storm water discharges. The Facilities Management Branch maintains and inspects fuel storage tanks, the storm water system, and wastewater treatment plant. An on-site Fire Department is available for first response during spill incidents. Partner organizations supply facility specific storm water related information. Listed in Table 1 are the members of the SWPP Team, with organization and associated responsibilities identified.

TABLE 1 STORM WATER POLLUTION PREVENTION TEAM						
Team Member	Code	Phone	Responsibility			
Environmental Protection Specialist	250.W	824 – 2319	The WFF SWPPT Coordinator and Clean Water Act Compliance			
Environmental Office Contractor Support	250.W	824 – 2327	Environmental Contractor Clean Water Act Compliance			
Laboratory Support Services	250.W	824 – 1941	VPDES Permit Compliance and Analytical Support			
Facilities Management Specialist	228	824 – 1191	Wastewater Treatment Plant Manager			
Fire Department Captain on Duty	803	824 – 1300	HAZMAT Primary Responder			
U. S. Navy Ecologist	NA	824 – 2082	Point of Contact to WFF for Environmental Compliance			
NOAA Facilities Supervisor	NA	824 – 7346	Point of Contact to WFF for Environmental Compliance			
U. S. Coast Guard Engineering	NA	336 – 2861	Coast Guard Housing Management			
Marine Science Consortium,, Senior Boat Captain	NA	824 – 5636	Operation and Maintenance of Marine Vessels			
Mid-Atlantic Regional Spaceport Manager	NA	824 – 2335	Point of Contact to WFF for Environmental Compliance			

3.0 DESCRIPTION OF POLLUTANT SOURCES

3.1 Site Drainage

Storm water inlets on the Main Base intercept natural drainage patterns (see Figure 2) and divert the flow to numerous discharge locations. Wallops Main Base has two types of permitted discharge outfalls – the Federally Owned Treatment Works (FOTW) process outfall 001 and storm water outfalls 003 – 014 (see Figure 3); outfalls 002 and 011 are located on Wallops Island. On the northern portion of the Main Base, both naturally flowing storm water and the extensive storm network drain to Little Mosquito Creek and eventually flow to the Atlantic Ocean. On the eastern and southeastern portions of the

Main Base, the natural drainage pattern flows to Jenneys Gut and Simoneaston Bay, then into Cockle Creek, Shelly Bay, and Chincoteague Bay before draining to the Atlantic Ocean. On the western and southwestern portions of the Main Base, the natural drainage pattern is toward Wattsville Branch, then to Little Mosquito Creek, and on to the Atlantic Ocean. National Pollutant Discharge Elimination System (NPDES) regulations require permits for storm water discharges associated with industrial activities. The Virginia DEQ is authorized to carry out NPDES permitting under the VPDES. WFF currently holds VPDES permit VA0024457 for 12 storm water outfalls. Descriptions of the outfalls are provided in Table 2.

The National Oceanic and Atmospheric Administration (NOAA), one of WFF's partners, operates a radar station (correlating Standardized Industrial Classification (SIC) code 4899) on the northeast corner of the facility. The NOAA facility is remote from any activity conducted by WFF. Four outfalls channel storm water from the NOAA facility. The outfalls are labeled on Figure 2 as NOAA 1 through NOAA 4. However, based upon the NOAA's SIC code, radar stations are not considered industrial activity and therefore do not produce discharges associated with industrial activity.

With the exception of several cross-culverts, storm drainage at Wallops Mainland is primarily toward Bogues Bay, Hog Creek, and Cat Creek, which all separate Wallops Mainland from Wallops Island. The Mainland portion of the facility does not generate storm water discharge associated with industrial activity as specified within regulatory guidance classifications. This portion of the facility does not expose industrial activity to precipitation, drain areas through percolation, produce sheet flows, or utilize concrete flumes. Therefore, matters concerning storm water runoff are not applicable for this area of the facility.

Wallops Island has storm drains that divert storm water flow to several individual discharge locations. The northern portion of Wallops Island drains by overland flow to Bogues Bay and Chincoteague Inlet via Sloop Gut and Ballast Narrows. The central portion of the island drains primarily to the west toward Bogues Bay. Outfall 002 was located on Wallops Island and served the sewage lagoons which were closed in 1993 upon completion of the Wallops Island force main. Outfall 011 drains a series of buildings and parking facilities, however, Wallops Island does not generate storm water discharge associated with industrial activity as specified within regulatory guidance classifications. This portion of the facility does not expose industrial activity to precipitation, drain areas through percolation, produce sheet flows, or utilize concrete flumes. Therefore, matters concerning storm water runoff are not applicable for this area of the facility.

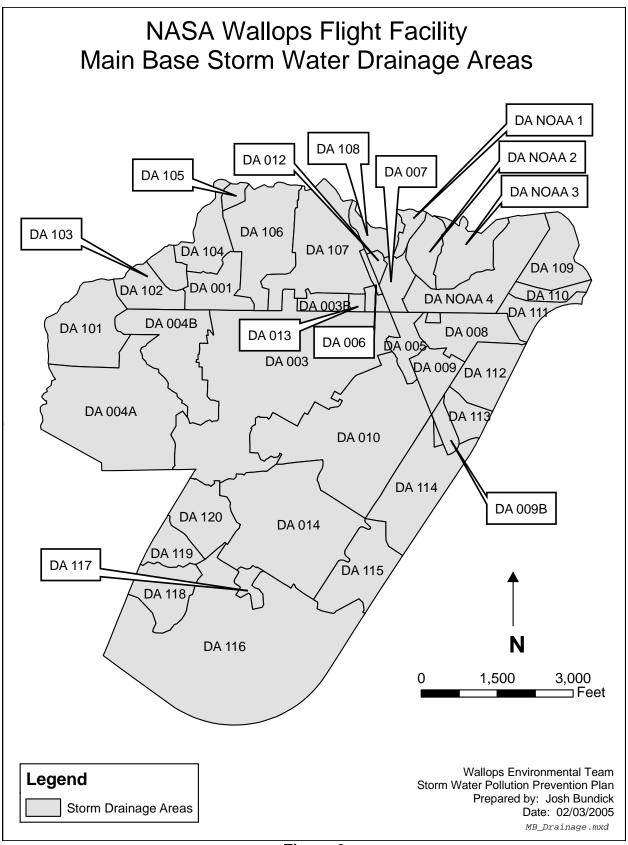


Figure 2

NASA Wallops Flight Facility Main Base Storm Water Drainage

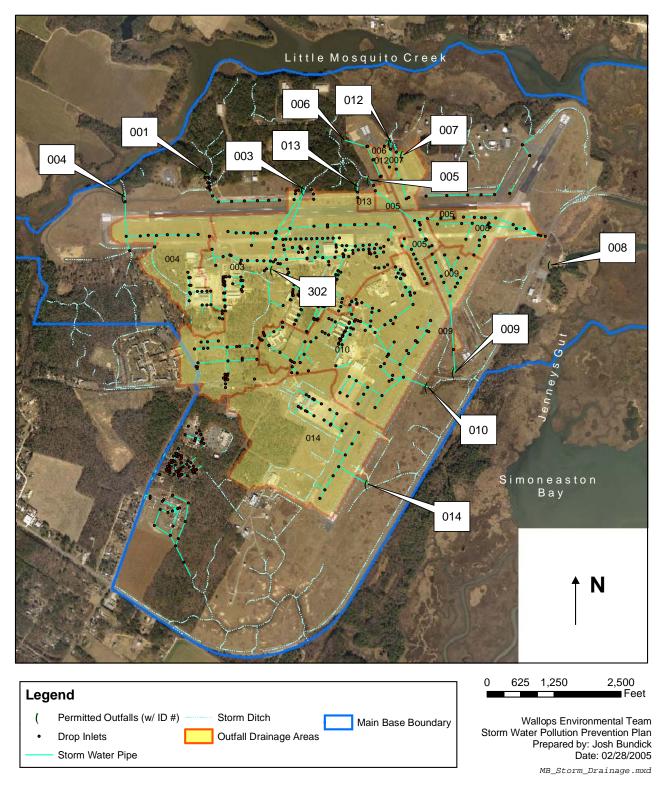


Figure 3

	Table 2. Storm Water Outfalls				
Outfall Number	Description				
003	Drains airfield runways, taxiways, aprons, and a hangar; satellite accumulation area and a less-than-90-day accumulation area (Building E-2); aboveground fuel storage tanks; office buildings; roadways, parking areas, and grassy areas. This outfall discharges to Little Mosquito Creek. Potential sources of pollution include possible fuel spills from airfield activities or releases from fuel delivery vehicles or possible hazardous waste spills from either a satellite accumulation area or the less-than-90-day accumulation area. A slight chance of storm water contamination from hazardous wastes exists; however, all satellite accumulation areas are required to have secondary containment and are located inside covered structures. In addition, the less-than-90-day accumulation area is located inside a brick building. This outfall drains approximately 204.6 acres (8.9 e ⁶ ft ²) and its weighted runoff coefficient is low at 0.39. During a 24-hour, 2-year storm event, approximately 8.03 million gallons per day (MGD) would discharge from this outfall.				
004	Drains airfield runways and taxiways, satellite accumulation areas, an enclosed salt storage facility, an automobile fueling facility and a maintenance garage, aboveground fuel storage tanks, roadways, parking areas, office and storage buildings, and grassy areas. This outfall discharges to Little Mosquito Creek. Potential sources of pollution include possible fuel spills from automobile fueling and maintenance, releases from fuel delivery vehicles, or airfield activities. The slight possibility of hazardous waste spills from satellite accumulation areas also exists; however, all satellite accumulation areas are required to have secondary containment and are located inside covered structures. This outfall drains approximately 54.1 acres (2.4 e ⁶ ft ²) and its weighted runoff coefficient is low at 0.31. During a 24-hour, 2-year storm event, approximately 1.72 MGD would discharge from this outfall.				
005, 006, 007, 008	Drain airfield runways, taxiways, and grassy areas. These outfalls discharge to Little Mosquito Creek. Potential sources of pollution include possible fuel spills from airfield activities. These outfalls drain approximately 18.9 acres (8.2 e ⁵ ft ²), 2.3 acres (1.0 e ⁵ ft ²), 12.4 acres (5.4 e ⁵ ft ²) and 29.0 acres (1.3 e ⁶ ft ²), respectively. Weighted runoff coefficients range from medium to high and are 0.52, 0.67, 0.40, and 0.46, respectively. During a 24-hour, 2-year storm event, discharges would be approximately 1.00 MGD from outfall 005, 0.16 MGD from outfall 006, 0.51 MGD from outfall 007, and 1.36 MGD from outfall 008.				
009	Drains airfield runways, taxiways, and grassy areas. This outfall discharges to Jenneys Gut. Potential sources of pollution include possible fuel spills from airfield activities. This outfall drains approximately 18.2 acres (7.9 e ⁵ ft²) and its weighted runoff coefficient is medium at 0.46. During a 24-hour, 2-year storm event, approximately 0.85 MGD would discharge from this outfall.				
010	Drains airfield runways, taxiways, and aprons, satellite accumulation areas, a less-than-90-day accumulation area (Building B-29), two restoration sites (one with low-level pesticide soil impacts and one with petroleum related groundwater impacts), and aboveground fuel storage tanks; office buildings, roadways, parking areas, and grassy areas. This outfall discharges to Jenneys Gut. Potential sources of pollution include possible fuel spills from airfield activities or releases from fuel delivery vehicles or possible hazardous waste spills from either a satellite accumulation area or the less-than-90-day accumulation area. The slight possibility of storm water				

	Table 2. Storm Water Outfalls					
Outfall Number	Description					
	contamination from hazardous wastes exists; however, all satellite accumulation areas are required to have secondary containment and are located inside covered structures. In addition, the less-than-90-day accumulation area is located in a concrete building that is protected by drains and troughs that would contain a spill within the area. The potential for contaminated runoff from the restoration sites exist, but due to site topographies, is highly unlikely. This outfall drains approximately 127.7 acres (5.6 e ⁶ ft ²) and its weighted runoff coefficient is low at 0.34. During a 24-hour, 2-year storm event, approximately 4.43 MGD would discharge from this outfall.					
012, 013	Drain airfield runways and taxiways and grassy areas. These outfalls discharge to Little Mosquito Creek. Potential sources of pollution include possible fuel spills from airfield activities. These outfalls drain approximately 3.2 acres (1.4 e ⁵ ft ²) and 2.6 acres (1.1 e ⁵ ft ²), respectively. Their weighted runoff coefficients are medium at 0.54 and 0.52, respectively. During a 24-hour, 2-year storm event, approximately 0.17 MGD would discharge from outfall 012 and 0.14 MGD from outfall 013.					
014	Drains airfield runways, taxiways, and a hangar; satellite accumulation areas and an aboveground fuel storage tank; roadways and parking areas; office and storage buildings; and grassy areas. This outfall discharges to Simoneaston Bay. Potential sources of pollution include possible fuel spills from runway activities or releases from fuel delivery vehicles or possible hazardous waste spills from satellite accumulation areas. However, all satellite accumulation areas are required to have secondary containment and are located inside covered structures. This outfall drains approximately 113.1 acres (4.9 e ⁶ ft ²) with a low weighted runoff coefficient of 0.28. During a 24-hour, 2-year storm event, approximately 3.32 MGD would discharge from this outfall.					
302 (intermediate outfall)	Intermediate Outfall 302 is an oil/water separator located at the aviation fuel tank farm. Water exiting outfall 302 travels a short distance through a ditch, enters the storm water system, and discharges through outfall 003 to Little Mosquito Creek. Potential pollution sources include fuel spills or leaks from the aviation fuel tank farm. However, the oil/water separator will capture any petroleum products released. This outfall drains approximately 0.1 acres (4.4 e³ ft²) with a high weighted runoff coefficient of 0.90. During a 24-hour, 2-year storm event, approximately 0.01 MGD would discharge from this outfall.					

3.2 Inventory of Exposed Materials

An inventory of exposed materials was developed from data collected through field surveys, inspections, and personnel interviews. Table 3 summarizes materials exposed to precipitation by location. Buildings B-129, D-1, F-10, and N-159 house chemicals in rooms with floor drains that are connected to the storm water management system. NASA's website, MSDS Pro[©] (http://msds.gsfc.nasa.gov:8080/1/locset1), contains current chemical inventories, along with links to the corresponding MSDSs, for each building at the facility.

TABLE 3 INVENTORY OF MATERIALS EXPOSED TO PRECIPITATION				
Location	Materials			
D-37	Drums of Used JP-5			
D-1 Hangar (floor drains)	MEK rags, Alodine, Methylene Chloride, JP-5, Oil, oily rags, spray cans, UW batteries, Paint thinner			
N-159 Hangar (floor drains)	JP-5, hydraulic oils, Diesel fuel			
F-10 (floor drain between main Building and	Hydraulic oils, cutting fluids, metal			
shop on west side)	scrap, dust			
Apron equipment storage area (<50 gallons)	JP-5, Diesel fuel			
B-30/B-31 - Outdoor equipment storage area	Oils			
M-1 – Receiving, outdoor equipment and	Mineral oil			
mobile generator storage				
F-26 - Fuel station	Gasoline & absorbent			
F-33 - Salt/sand storage	Salt & Sedimentation			
F-7 – Outdoor material storage	Metal scrap, dust			
Area west of F-10 to F-20 (garage, rigging, vehicle, mobile generators)	Diesel fuel, hydraulic oil			
Mobile tracking storage area, east of E-Area	Diesel fuel, hydraulic oil			

3.3 Spills and Leaks

The Environmental Office maintains records of spills, leaks, and releases of hazardous or toxic pollutants to the environment. Spills in reportable quantities are reported to the appropriate agencies. Reportable quantity spills and leaks are remediated as effectively and expeditiously as possible, and in accordance with applicable rules and regulations. Listed in Table 4 are spills and leaks of reportable quantity for the last 3 years.

TABLE 4						
	3-YEAR SPILL AND LEAK HISTORY					
Date	Date Location Substance Quantity					
01/27/2005	West of Building D-1	JP-5	~51 gallons			

At 10:50 a.m. on January 27, 2005, the WFF Fire Department received notice and responded to a spill from a 195 gallon (738 liter) mobile power generator in use west of the D-1 hangar (see Figures 4 and 5). The auxiliary tank of the generator holds 100 gallons and the main tank holds 95 gallon of JP-5. Prior to the incident, the generator had engaged for 1 hour, consuming approximately 22 gallons of fuel (based upon a later test burn). Following the incident, 120 gallons of fuel were drained from the combined tanks. Therefore, approximately 53 gallons of JP-5 were released. Approximately 1 gallon of JP-5 fuel was contained by absorbent vermiculite. The spill was traced to the nearest storm water drop inlet. Upon notification of the spill, the Wallops Environmental Office sent a team to outfall 003 to determine if a sheen was visible. At approximately 12 noon, 1 large and 8 small absorbent booms were placed across the unnamed tributary to which outfall 003 discharges.

NASA WFF 51 Gallon JP-5 Spill January 27, 2005

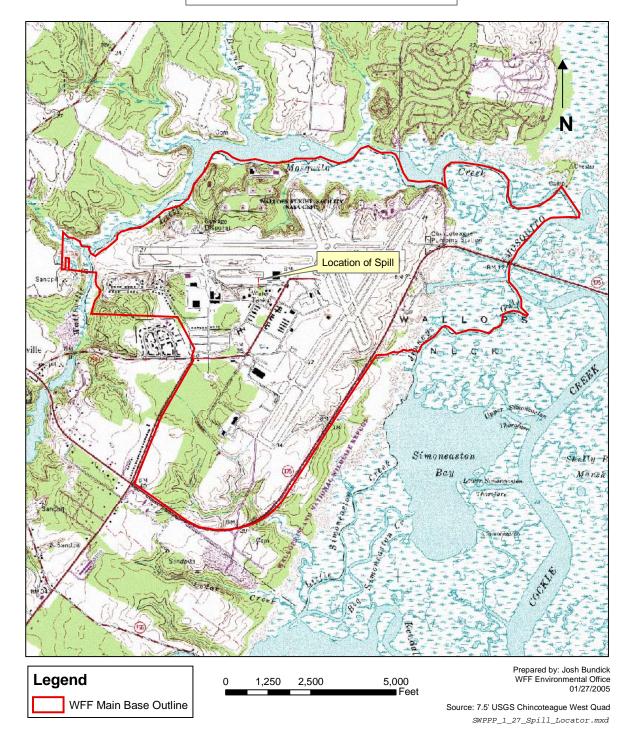


Figure 4

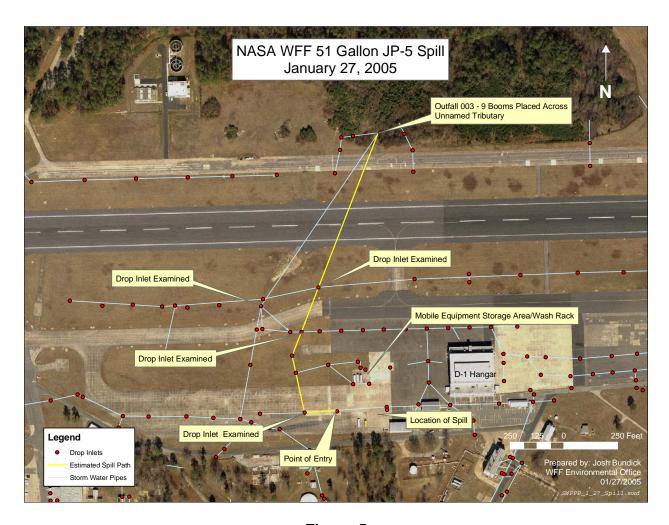


Figure 5

At approximately 12:15 p.m. a slight odor was detected and was followed by an oily sheen which was absorbed by the booms placed across the tributary. A team walked the tributary to determine if a visible sheen or a petroleum-like odor was evident downstream. The team sampled the tributary between the outfall and the booms with a photoionization detector (PID). PID readings indicated approximately 3 parts per million (ppm) of petroleum approximately 20 feet from the outfall, within the booms. Further reconnaissance of the tributary to Mosquito Creek revealed no product present. The following morning, a water sample was collected at outfall 003 and sent to Gascoyne Laboratories for analysis of Total Petroleum Hydrocarbons (TPH) for both the gasoline range organics (GRO) and diesel range organics (DRO). Approximately 1,200 gallons of potable water were flushed down the drop inlet. After the slug of water passed through the outfall, samples were again collected for both TPH GRO and DRO analysis.

Table 5 illustrates that analytical results of water samples collected at outfall 003 prior to and after flushing the storm water system are consistent with recent background samples.

TABLE 5 BACKGROUND AND SAMPLING ANALYSIS FROM 1/27/2005 SPILL						
Sample	Sample TPH-GRO (ppm) MDL* TPH-DRO (ppm) MDL*					
Background (7/29/2004)	<0.5	0.5	<0.5	0.5		
Background (10/27 & 10/28/2004)	<0.5	0.5	<0.5	0.5		
Prior to flushing	0.226	0.013	Broken upon receipt			
After flushing	0.232	0.013	<0.5	0.5		

As a result of this incident, WFF management has stipulated that all mobile equipment that holds greater than 50 gallons (190 liters) of oil will be stored on the Mobile Tanker Storage Area. This area drains through an oil/water separator prior to treatment at the Federally Owned Treatment works. Because equipment storing less than 50 gallons (190 liters) of fuel will still be stored on the airfield apron, the area adjacent to the Mobile Tanker Storage Area was added to the Storm Water Pollution Prevention Plan's High Risk Area list and is inspected on a quarterly basis. Sorbent socks and pillows are placed around any suspect equipment.

3.4 Sampling Data

Scheduled samplings of storm water discharges are performed to meet VPDES monitoring requirements. WFF's current VPDES permit, dated August 18, 2004, specifies the constituents to sample and sampling frequency for both process outfall 001 and storm water outfall 003. Analysis is conducted in accordance with EPA analytical laboratory test methods. Sampling and analysis undergo quality control and quality assurance (QA/QC) review to ensure validity of analytical results. Sample results are reported in the monthly Discharge Monitoring Report (DMR) at the frequency specified by the VPDES permit. A description of each discharge and the receiving stream is presented above in Table 2. The DEQ DMRs are presented in Appendix A.

3.4.1 Record of Sampling History

Initial storm water sampling was performed to meet requirements for the original Application for Permit to Discharge Storm Water Associated with Industrial Activity and submitted to the Virginia Department of Environmental Quality (DEQ) State Water Control Board (SWCB) on October 1, 1992. Outfalls 004, 005, 007, 010, and 011 were selected for sampling based on representation of associated industrial activity. Outfalls 006, 008, 009, 012, 013, and 014 were considered "substantially identical" to outfall 005 by definition. This definition was accepted and approved by the SWCB.

The initial storm water sampling event was held on December 10, 1992. The duration of the event was 48.8 hours with a total recorded precipitation of 1.48 inches (3.76 centimeters). The storm water samples were collected during the first 3 hours of the event. They were analyzed for the following constituents:

- Chemical Oxygen Demand/Total Kjeldahl Nitrogen;
- Biological Oxygen Demand (BOD);
- Total Suspended Solids (TSS);
- Fecal Coliform;
- Benzene, Toluene, Ethylbenzene, Xylene (BTEX);
- Oil and Grease:
- PCB/Pesticides:
- Total Phenols;
- Cyanide; and
- Metals (aluminum, barium, cadmium, chromium, copper, iron, lead, magnesium, zinc).

Sampling results indicated no significant discharge of pollutants. An elevated fecal coliform count was detected at outfall 004. Field sampling staff determined that this finding was attributed to the presence of indigenous mammals, since tracks and animal wastes were noted throughout the area during outfall surveillance.

In 1995, a scheduled storm water sampling event resulted in a detection report to the DEQ SWCB of 1,1,1-trichloro-2,2-bis(p-chlorophenyl)ethane (DDT); 1,1-dichloro-2,2-bis(p-chlorophenyl)ethane (DDD); and 1,1-dichloro-2,2-bis(p-chlorophenyl)ethane (DDE) for outfall 003. The simultaneous appearance of DDT, DDD, and DDE suggested that the principal chemical that may have been used at the facility up to the time of its ban in 1972 had broken down, over time, into its decomposition derivatives of technical DDT. The 1998 composite sampling was executed as a "once-per-permit-term" sampling event as specified by VPDES permit requirements. The 1998 analyses results indicated that the chemicals were not present in detection levels that exceeded regulatory limits. Facility interviews and investigations performed in 1998 by the Environmental Office indicated that DDT had not been stored or used at the facility since its ban in 1972. No further investigation was required as an outcome of this finding.

Process outfall 001 and storm water outfalls 003 and 301 were permitted under the August 10, 1999, VPDES permit #VA0024457. Outfall 001 receives effluent from the FOTW located on the Main Base. Outfall 003 receives storm water discharges from the D-37 fuel farm oil/water separator (outfall 302) and airport runways. Intermediate outfall 301 (oil/water separator) drains the equipment wash rack and mobile tanker storage area and was historically sampled for VPDES Permit compliance. Table 6 represents the summary of the 2000 to 2004 VPDES permit sampling from the storm water outfalls.

HISTORI	TABLE 6 HISTORIC VPDES STORM WATER COMPLIANCE SAMPLING SUMMARY, January 2000 - August 2004					
Parameter Outfall 003			Outfall 301			
	Annual Average	Highest Value	Annual Average	Highest Value		
pН	6.8	8.0	7.1	8.1		
TSS, (mg/L)	7.4	13.2	5.0	11.4		
TPH, (mg/L)	0.78	5.4	1.59	6.94		
mg/L – milligrams per liter						

During the current permit application process, it was determined that the diversion valve at outfall 301 would be locked in the "open" position and a mechanical plug would be placed in the connector piping that drains to the storm water system. These measures ensure that all waters (both wash and storm) drain to the FOTW. Five years of sampling data from intermediate outfall 302 resulted in no significant contamination reported. Therefore, after evaluating the facility's industrial activities and reviewing the analytical results, the DEQ removed outfall 301 from the current permit and no longer requires sampling of intermediate outfall 302.

3.5 Potential Pollutant Sources Associated with Industrial Activity

Potential pollutants entering the storm water conveyance system are associated with airport operations and space vehicle parts manufacturing. These operations are permanent functions at the facility. Considerably fewer than 10,000 flights occur per year at the facility airport with 8,562 flights recorded in 2004 (January 1, through September 2, 2004). No aircraft de-icing is conducted at the facility.

3.5.1 Petroleum Storage

Petroleum storage tanks at the facility contain fuels associated primarily with facility heating and airport activities. All ASTs are registered with the DEQ per 9 VAC 25-91 Facility and AST Registration regulations. Figure 4 illustrates locations of storage tanks on the Main Base. A list of storage tanks indicating tank contents, volume, location, and spill risk analysis with flow direction is included in WFF's current Integrated Contingency Plan (ICP).

The WFF topography is generally flat with very porous soils, and therefore, most major spills are likely to flow equidistantly around the source. To reduce the potential of fuel release into storm water conveyances, secondary containment structures designed to hold greater than 125 percent of the tank's maximum capacity have been installed around every AST. In compliance with ICP Work Instructions, secondary containment structures are inspected periodically and emptied of debris or precipitation as needed. Inventory control is practiced per Virginia Statutory Authority §62.1-44.34:15.1 and 9 VAC 25-91.

Trained NASA personnel and contractors monitor fueling to ensure that no fuel releases occur. In addition, all personnel involved in fueling operations (both onsite and fuel deliverers) attend annual training sessions on fueling procedures and pollution prevention practices. All delivery tankers are required by contract to carry spill containment kits.

Portable ASTs brought to WFF for specific projects are required to have secondary containment and to be registered with DEQ when capacity exceeds 660 gallons (2,500 liters). Each portable tank's specific management requirements are outlined within contractual agreements when located on WFF property.

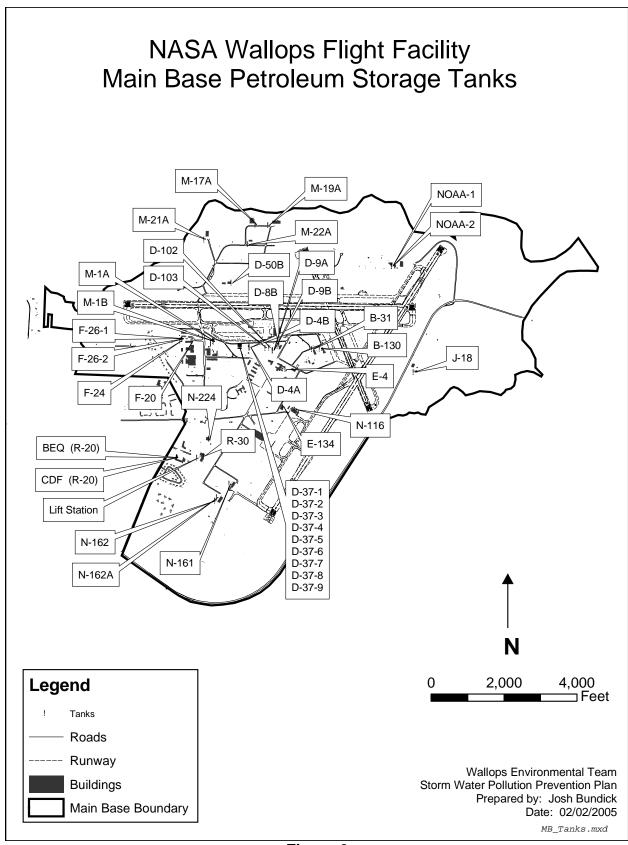


Figure 6

Airport structures at the facility include fueling stations, wash rack facilities, taxiways, aprons, runways, and storage/maintenance hangars. The aviation fueling station consists of five 20,000 gallon (75,708 liter) underground storage tanks (USTs) containing Jet Propulsion Fuel-5 (JP-5), two 10,000 gallon (38,754 liter) USTs containing Jet Propulsion -Thermally Stable (JPTS) fuel, one 10,000 gallon (38,754 liter) UST containing fuel that does not meet specifications as JPTS (Off-Spec), and one empty 12,000 gallon (45,425 liter) UST (connected down-line from the oil-water separator for spill containment). Off-Spec fuel is used alternately to JP-5 when the fuel meets specifications as JP-5. The USTs for aviation fuel are contained in one secured tank farm area and are equipped with comprehensive leak detection, spill overfill and corrosion protection, interstitial monitoring, and a series of groundwater monitoring wells. Fuel is transferred to aircraft via fuel tank trucks owned and operated by WFF. Trained personnel monitor fuel transfers. Storm water catch basins at the fuel tank farm are equipped with an oil/water separator (outfall 302) that drains to VPDES permitted outfall 003.

The facility maintains a fueling station for government owned passenger and service vehicles. The fueling station consists of one 10,000-gallon (38,754 liter) Underground Storage Tank (UST) containing gasoline and one 10,000-gallon (38,754 liter) UST containing diesel fuel. These USTs are equipped with appropriate leak detection, spill overfills, and corrosion protection, interstitial monitoring, and a series of soil vapor monitoring wells. Storm water from this area drains westerly, overland, to a local drainage ditch and eventually to outfall 004. A single bay car wash is attached to the fueling station. Wash water is passed through a sand filter in a closed loop system and is reused for the next wash cycle. No discharges result from the car wash.

Wash rack facilities at WFF are used for the cleaning of large equipment, fire trucks, and NASA aircraft. The catch basin for the wash rack is equipped with an oil/water separator (outfall 301). The oil/water separator is outfitted with a sampling port, however based on past analytical results DEQ no longer requires monitoring of the separator. At all times, a diversion valve located at the wash rack conveyance is locked in the "open" position to divert both wash waters and storm water to the FOTW. Mobile aircraft fueling vehicles are regularly parked within an area adjacent to the wash rack. This area also drains to the oil/water separator and the mobile equipment is inspected regularly by the Logistics Management Division for containment integrity and proper mechanical function. Both the wash rack/mobile equipment storage area and the fuel tank farm oil/water separators are inspected monthly and emptied when necessary by the Facilities Management Branch.

3.5.2 Hazardous Waste Storage

WFF maintains 32 hazardous waste accumulation areas, most of which are covered and within secondary containment (see Figure 7 and Table 7). One accumulation area, located at the D-37 aviation fuel farm, is exposed directly to storm water. However, to minimize risk, all materials are stored in a sealed drum within an area that drains through the outfall 302 oil/water separator. Several other accumulation areas present a storm water risk based upon their location within buildings. The accumulation areas at the Cropper Center and Buildings D-50, F-27, and N-168 are located near large doors and

NASA Wallops Flight Facility Main Base Potential Sources of Storm Water Pollution

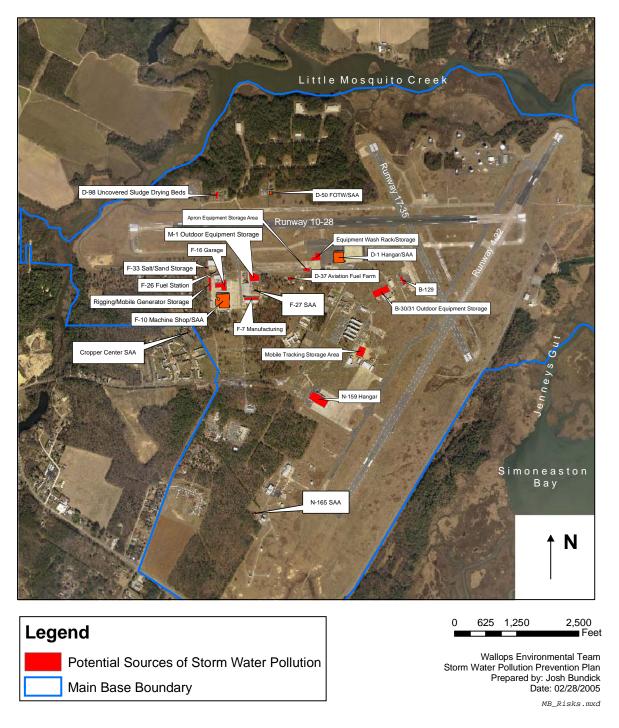


Figure 7

are not protected with secondary containment. Furthermore, the accumulation areas in D-1 hangar and Building F-10 are located in areas of the buildings in which floor drains are connected to the storm sewer. Although these areas are not exposed to storm water, the occurrence of a spill in conjunction with a storm event presents a risk. To ensure the integrity of all accumulation areas and to minimize storm water risk, they are inspected quarterly by the Environmental Office and annually by the DEQ Waste Division. Less than one 55-gallon (208.175 liter) drum of any hazardous waste or 1 quart (0.95 liters) of an acutely hazardous waste, P-listed (40 CFR 261.33), may be stored at any of the above mentioned satellite accumulation areas.

HAZARDOU	TABLE 7 HAZARDOUS WASTE ACCUMULATION AREAS WITH STORM WATER RISK WFF MAIN BASE EPA ID #VA8800010763				
Bldg.	Bldg. Waste Codes Waste Description				
Cropper	Non	Used oil, used antifreeze, oily rags			
D-1 Hangar	D001, D035, F003, F005, Non, D007, D002, UW	MEK rags, Alodine, Methylene Chloride, JP5, Oil, oily rags, spray cans, UW batteries, Paint thinner			
D-37	D001	JP5/JPTS fuel changes			
D-50	Non	Used oil			
F-10	F003, D008, Non	Acetone rags, Nonhaz cutting fluid, oil, and blaster grit containing lead			
F-27	Non	Gasoline and absorbent			
N-165	Non	Used oil, D039, D040 PW, used oil from antenna changes			

3.5.3 Environmental Restoration Program

Formal environmental investigations on a facility-wide basis began in 1988 and continue today as an active program with EPA and DEQ providing oversight. A series of facility-wide surveys, assessments, and inspections were performed by NASA between 1988 and 1996. The purpose of these investigations was to assess the site conditions and identify Areas of Concern (AOCs) that may pose a potential threat to human health or the environment through a release of hazardous materials or substances (see Figure 8). Actions conducted at the AOCs include supplemental investigations, sampling programs, removals, product recovery, remedial investigations (RIs), feasibility studies (FSs), remediation, and closeout.

Effective December 8, 2004, NASA and the EPA entered into an Administrative Agreement on Consent (AAOC) [U.S. EPA Docket Number: RCRA-03-2004-0201TH]. The AAOC was issued under the authority of the Resource Conservation and Recovery Act (RCRA) as amended by the Hazardous and Solid Waste Amendments, and by agreement integrates the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) as amended by the Superfund Amendments and Reauthorization Act, into meeting the obligations of the AAOC. As the model for the environmental restoration program, the AAOC applies to past releases of hazardous substances, waste

and/or constituents at WFF and identifies CERCLA response requirements, policies, and guidance as the primary process for planning for and performing the work necessary to complete remedial and corrective actions appropriate to those releases.

In addition to NASA environmental programs at WFF, the U.S. Army Corps of Engineers (USACE) has an active environmental program at WFF. NASA acquired the property from the Navy in 1959. Prior to NASA operations, the Navy operated an aviation training facility at the Main Base for approximately 17 years. Some of the AOCs identified in the initial surveys were identified as being associated with activities that solely took place prior to NASA presence. Because of this finding, the USACE, in consultation with NASA and EPA, conducted a series of assessments and investigations to determine responsibility and eligibility for these AOCs under the Formerly Utilized Defense Sites (FUDS) program. This program authorizes the USACE as the lead DOD agency for the environmental restoration of properties that were formerly under DOD control. Table 8 summarizes the status of the AOCs.

TABLE 8 AREAS OF CONCERN AT WALLOPS FLIGHT FACILITY						
Site	Contaminant	Status				
Former Fire Training Area	GW: VOC, SVOC, Arsenic, Manganese	FS ongoing				
Site 16 Waste Oil Dump	GW: VOC, SVOC	Supplemental RI and FS ongoing				
M-15 Photographic Tank	Soil/Sediment: Metals	Investigation Phase				
Site 2 - Old Maintenance Facility E-52	Soil/Sediment: VOC, Metals, Pesticides GW: No data available	Investigation Phase				
Scrapyard (N-222)	Soil/Sediment: PCB GW: No data available	Removal Action Completed 11/7/03 Groundwater Investigation ongoing				
N-161C Transformer	Soil/Sediment: PCB	No Further Action Decision Document signed 03/05/03				
Site 11 - Transformer Storage Areas M3, M4, V-30	Soil/Sediment: PCB	No Further Action Decision Document under Regulatory Review				
Site 7 - PCB Stained Pads @ D49A, E105/106	Concrete: PCB	No Further Action Decision Document under Regulatory Review				
Pistol/Rifle Range	Unknown at this time	Preliminary Planning Phase				
Old Aviation Fuel Tank Farm	Soil/Sediment: TPH, VOC GW: TPH, BTEX	Corrective Action Plan Implementation				
Site 1 - Old Wastewater Treatment Plant	Soil/Sediment: No data	Investigation Phase – Deferred to FUDS Program				
Site 13 - Boat Basin Area	Soil/Sediment: Potential Ordnance	Investigation Phase – Deferred to FUDS Program				
Site 3 - Two 600k Gal USTs A-46A &B	Soil/Sediment: Suspected TPH	Investigation Phase – Deferred to FUDS Program				
Site 14 - Debris Pile	Soil/Sediment: Metals, VOC, SVOC, PCB, pesticides GW: PAH, metals	Investigation Phase – Deferred to FUDS Program				

TABLE 8 AREAS OF CONCERN AT WALLOPS FLIGHT FACILITY						
Site	Contaminant	Status				
Site 15 - Debris Pile	Soil/Sediment: Diesel fuel, asbestos, pesticides, styrene GW: PAH, metals	Investigation Phase – Deferred to FUDS Program				
Site 9 - Abandoned Drum Field Runway 17-35	Soil/Sediment: Metals, PAH, PCB, pesticides GW: Metals, PAH, PCB, pesticides	Investigation Phase – Deferred to FUDS Program				
Construction Debris Landfill	Soil/Sediment: Metals, VOC, SVOC GW: Metals, VOC, SVOC	Investigation Phase				

3.5.3.1 Current Status of Active AOCs

Old Wastewater Treatment Plant (WWTP)

The WWTP was constructed by the Navy in the early 1940s. The plant is located to the northwest of the intersection of Runway 17-35 and the taxiway that parallels Runway 10-28. NASA never used the facility for any purpose. NASA, EPA, DEQ, and the USACE have reviewed records for the site and have concluded that the WWTP should be addressed through the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004.

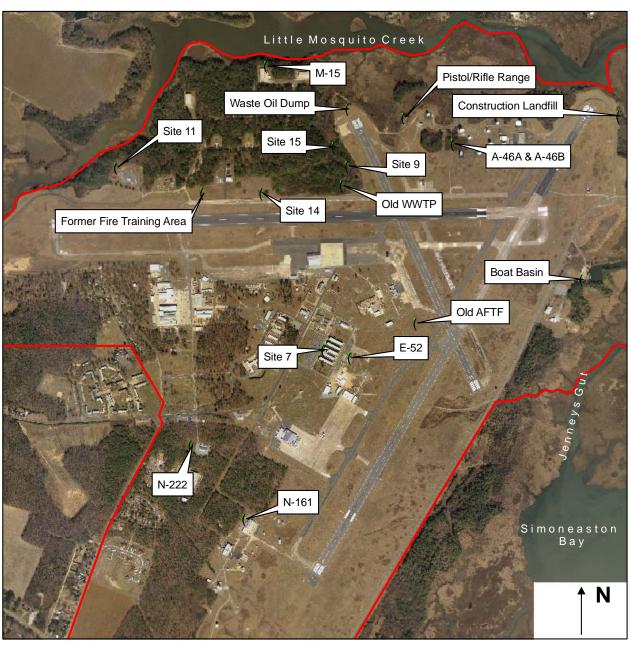
Maintenance Facility (Site 2)

The Maintenance Facility (Building E-52 or Site 2) is located in the central portion of the Main Base. The site consists of the former location of a motor pool and maintenance shop operated by the Navy and later operated by NASA as a landscaping and grounds maintenance shop. Building E-52 was demolished in 1994 and a portion of the area is currently an asphalt parking lot. A series of investigations were conducted at the site from 1988 through 1993. These investigations identified the presence of residual contamination in soils. The site is currently scheduled for additional investigations by NASA.

Two 600,000-Gallon Fuel Tanks (A46-A and A46-B)

Buildings A46-A and A46-B consists of two underground 600,000-gallon fuel storage tanks and associated piping and control structures. The facility is located in the northeast corner of the Main Base. The Navy constructed the two underground storage tanks and used the tanks for the storage of JP-4 fuel. The tanks were reportedly decommissioned by removing the product and filling the void with sea water. NASA has not used the tanks or associated facilities since the transfer of property. NASA, EPA, DEQ, and the USACE have reviewed records for the facility and have concluded that it should be addressed through the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004.

NASA Wallops Flight Facility Main Base Areas of Concern





0 500 1,000 2,000 Fee

Wallops Environmental Team Storm Water Pollution Prevention Plan Prepared by: Josh Bundick Date: 02/28/2005

MB_AOCs.mxd

Figure 8

Transformer Pads (Site 7)

Site 7 consists of former electrical transformer locations. These locations were identified as an AOC due to the presence of staining or reports of possible leakage of dielectric fluids containing PCBs. NASA removed all of the transformers and disposed of them offsite in accordance with applicable regulations. A series of transformer inventories, replacement programs, and sampling and remediation programs to address these locations was implemented by NASA from 1985 through 2004. A report presenting the actions taken and the current status of each location was prepared and submitted to EPA and DEQ in September 2004. Data from the remainder of the Site 7 locations is currently being reviewed by NASA, EPA, and DEQ to support site closure.

Abandoned Drum Field (Site 9)

Site 9 was discovered during a NASA walk-through survey of facility storm water discharges and was designated as an AOC. The site consists of abandoned drums located within the tree line along Runway 17-35. The abandoned drum field is approximately 600 feet long and ranges from 20 to 200 feet in width. A review of historical photographs revealed that the drum field was present prior to NASA's acquisition of the property in 1959. Since the property transfer, NASA has not utilized the area for any purpose. NASA, EPA, DEQ, and the USACE have reviewed available records and have concluded that Site 9 should be addressed through the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004.

Transformer Storage Areas (Site 11)

Site 11 consists of three buildings where Site 7 transformers removed from service were temporarily stored before being sent off site for disposal. All of the transformers have been removed from the buildings and disposed of off-site in accordance with applicable regulations. The buildings are currently used for other purposes. NASA conducted a series of investigations at the AOC; generated data indicates that PCB levels are below acceptable regulatory criteria. A report presenting the actions taken and the current status of each location was prepared and submitted to EPA and DEQ in September 2004. The findings are currently being reviewed by NASA, EPA, and DEQ to support site closure.

Ordnance Disposal Area (Boat Basin)

The Ordnance Disposal Area consists of the boat basin and surrounding land features that were used by the Navy as a transfer and reportedly disposal location for ordnance. The boat basin was constructed and used by the Navy prior to the 1959 property transfer to NASA. Since acquiring the facility, NASA has not used the boat basin for any ordnance disposal activity, has never used the type of ordnance identified at the site, and has only used the area for docking purposes. NASA, EPA, DEQ, and the USACE have reviewed available records and have concluded that the Boat Basin should be addressed through the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004.

Debris Pile (Site 14)

Site 14 consists of debris piles located along the taxiway north of Runway 10-28. Historical photographs dating prior to NASA's acquisition of the facility in 1959 indicate the presence of the debris piles. Since the property transfer, NASA has not used the area for any purpose. NASA, EPA, DEQ, and the USACE have reviewed available records and have concluded that Site 14 should be addressed through the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004

Debris Pile (Site 15)

Site 15 consists of debris piles located near the north end of Runway 17-35. Historical photographs dating prior to NASA's acquisition of the facility in 1959 indicate the presence of the debris piles. Since the property transfer, NASA has not used the area for any purpose. NASA, EPA, DEQ, and the USACE have reviewed available records and have concluded that Site 15 should be addressed through the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004.

Waste Oil Dump (WOD)

The WOD is located beyond the end of Runway 17-35. The AOC was reportedly used by the Navy and NASA for the disposal of waste oils and other flammable liquids (possibly solvents). Petroleum contaminated soils were excavated and removed from the site by NASA in 1986. A records review and sampling conducted identified the area as an AOC due to the presence of contamination in soils and groundwater. An RI conducted at the WOD in 2001 confirmed the presence of contamination at the site. NASA conducted a Supplemental RI at the site in 2003 and issued a final RI Report in 2004. Additional investigations and/or actions are scheduled for the WOD.

Old Aviation Fuel Tank Farm (AFTF)

The AFTF, located near the center of the Main Base and adjacent to the active runway. consisted of a fuel tank farm for the storage and distribution of fuels for airplanes and vehicles. The facility was constructed and operated by the Navy and later used by NASA until 1982 when a new aviation fuel tank farm was constructed. Releases from the site were identified in 1988. Further sampling and analysis conducted at the site identified petroleum-related contamination present in soils and groundwater. In 1991, all of the tanks, pumps, buildings, and 4,700 tons (4,264 tonnes) of petroleumcontaminated soil were removed from the AFTF site. NASA reported the findings. Actions under federal and state petroleum and UST programs were initiated. These actions have included the completion of site characterization studies and the design and implementation of Corrective Action Plans (CAPs). NASA is currently operating remediation systems and performing routine monitoring and reporting at the AFTF under the DEQ Storage Tank program. NASA, EPA, and DEQ have reviewed records for the site and have concluded that the site is exempt from CERCLA and have deferred all actions to the UST program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004.

Scrapyard (N-222)

The Scrapyard is located near the main gate. Sampling conducted at the Scrapyard in 1990 identified PCB and mercury contamination in soils. Additional investigations at the Scrapyard have included a Limited RI, radiological surveys, further site characterization, and removal actions. Additional investigations and/or actions are scheduled for the Scrapyard.

PCB Transformer Pad (N-161C)

The N161C Transformer Pad, located in the southern portion of the Main Base, was identified as an AOC because of visible staining under and around the transformer. NASA replaced the transformer in 1990 and initiated a soil sampling and excavation program that resulted in the removal of PCB contaminated soils to regulatory requirements. NASA, EPA, and DEQ have reviewed the site documents and analytical results from site samples and have concluded that No Further Action is required at the N-161C Transformer Site. This decision was documented in a Decision Document signed by EPA, DEQ, and NASA in 2003.

Photographic Tank (M-15)

The Photographic Tank is located behind Building M-15 on the north side of the Main Base. The Photographic Tank is a wastewater processing tank that received wash and rinse waters associated with a photographic developing laboratory. The AOC was initially sampled in 1990; the analytical results indicated a possible release due to overflows that occurred from the tank. Subsequent sampling and investigations characterized the nature of the contamination at M-15 and concluded that surface soils associated with the site contained metals contamination that may present a risk to the environment. Additional investigations and/or actions are planned for the M-15 Photographic Tank Site.

Former Fire Training Area (FFTA)

The FFTA is located along Runway 10-28 in the northern portion of the Main Base. The site was used by the Navy and NASA for fire fighter training exercises. It is reported that flammable liquids were dispersed onto the ground, into a pit, onto an abandoned plane fuselage, and/or into a tank and ignited for these exercises. Petroleum contaminated soils were excavated and removed from the site by NASA in 1986. A series of site inspections were conducted at the site and the data indicated a release had occurred at the FFTA. An RI conducted at the FFTA in 1996 confirmed the presence of contamination at the site. NASA conducted additional sampling and analysis at the FFTA in 2000 and 2003 and a Supplemental RI Report was issued in 2004. Additional investigations and/or actions are scheduled for the FFTA.

Construction Debris Landfill

The Construction Debris Landfill is located in the northeast corner of the Main Base. Historical aerial photography indicates that the area was used as a disposal site prior to NASA property acquisition in 1959. NASA has not used the area for any purpose since property transfer. NASA, EPA, DEQ, and the USACE have reviewed available records and have concluded that the Construction Debris Landfill should be addressed through

the FUDS program. This decision was documented in a Consensus Document signed by EPA, DEQ, and NASA in September 2004

Pistol/Rifle Range

A review of historical aerial photographs and records conducted by USACE, and a review of current facility practices identified the Pistol/Rifle Range as a potential AOC. The range was first noted as being present at WFF in 1949. The range is located in the northeast corner of the Main Base and was in use through 1999. The range is currently inactive. No additional investigations of the range have been performed by NASA.

Except for Site 2 and the Old AFTF, all of the AOCs described above drain storm water runoff by overland sheet flow. Storm water from Site 2 and the Old AFTF discharge through outfall 010. Based upon the topography of Site 2 and the fact that groundwater, not soils, is impacted at the Old AFTF, risks to surface waters are not anticipated.

3.5.4 Other Potential Pollutant Sources

Other potential pollutant sources at the WFF consist of the aircraft runways; rocket motor storage areas; paint spray, sandblasting grit, and drum storage locations; previous sites of contamination; and hazardous waste satellite accumulation areas. Figure 9 summarizes and depicts all potential storm water risks and their associated drainage basins at Wallops Flight Facility.

The facility utilizes three runways for aircraft flights (totaling less than 10,000 per year). The majority of the flights are for aeronautical or airborne earth science research. Runways are designated by number (10-28, 17-35, and 4-22). Storm water conveyances are located around the runways. Potential pollutants resulting from aircraft operations include benzene, toluene, ethylbenzene, xylene, and surfactants. Grass buffer strips are maintained between the runway surface and storm water inlets. Additionally, runways are inspected daily for dirt and other particulate matter and vacuumed when needed. By utilizing this combination of practices, WFF reduces sediment and pollutant loading into the storm water drainage system.

Space vehicle parts manufacturing is conducted for rocket launch activities at the WFF and other off-site locations. Manufacturing facilities include Buildings F-10 and F-7 on the Main Base. Activities related to these buildings that are subject to storm water runoff include temporary outside storage of rocket components, and outdoor spray painting and sand blasting of manufactured rocket components. Buildings F-10 and F-7 contain machine shops, electronics assembly shops, and related facilities. Prior to machining, raw materials for metalworking are routinely stored outside Building F-10. Potential pollutant sources resulting from this storage include aluminum, iron, and magnesium. Permanent storage of finished components is under covered structures.

Most plant operation and maintenance activities, such as vehicle maintenance, electrical services, heating and cooling services, painting, and wood working, are housed in Building F-16. Operations are conducted inside, but heavy equipment is parked outside

NASA Wallops Flight Facility Main Base Summary of Potential Storm Water Impacts

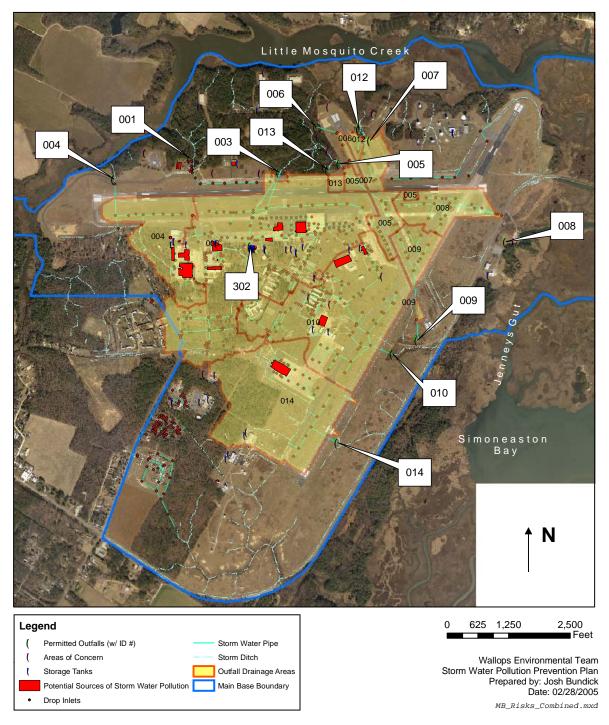


Figure 9

near the vehicle maintenance garage. Potential pollutants from parked equipment include gasoline, diesel, hydraulic and lubricating fluids, coolants, and various heavy metals. The garage stocks clay, vermiculite, and spill response kits for containing small leaks and spills.

Under WFF's current VPDES permit, its FOTW is permitted to treat domestic waste and to dry sludge on both covered and uncovered drying beds. Although the FOTW's treatment basins are exposed to storm water, their design capacity (0.3 MGD) is far greater than current daily flows (0.07 MGD) and therefore no overflow has ever occurred or is expected. Furthermore, WFF's uncovered D-98 sludge drying beds have permeable bottoms that permit rapid drainage to the sewage collection system (comminutor basin) without overflowing. After drying and testing, all sludge is disposed of as solid waste in the Accomack County North Landfill.

4.0 MEASURES AND CONTROLS

This SWP3 emphasizes pollutant source control as opposed to "end of pipe" control measures and devices. To reduce the potential for pollutant release at the facility, annual classroom and on-the-job training addresses materials management and emergency procedures. The potential for releases is reduced through source control measures such as sediment and erosion control, prudent housekeeping measures, periodic training, inspections, maintenance, and preventive measures.

The WFF Environmental Office monitors active and planned facility projects, environmental restoration programs, and mission projects for potential impacts to the environment. Potential impact to the storm water network is included in this monitoring process. Plans for construction and renovation as well as new operations are reviewed in the early planning stages to verify that appropriate storm water management procedures are planned and implemented. Should a proposed project impact the storm water network, the WFF will take all necessary measures to ensure that it meets applicable storm water requirements and regulations.

4.1 Summary of Potential Pollutant Sources and Control Measures

The WFF has implemented the following control measures, listed in Table 9, to reduce the pollutant release risks associated with its industrial activities.

The WFF source control pollution prevention practices appear successful, since recent storm water sampling results indicate no significant pollutants are reaching surface waters. Ground maintenance personnel periodically clean storm water catch basins of debris.

TABLE 9 CURRENT CONTROL MEASURES FOR POTENTIAL POLLUTANT SOURCES				
SIC Code		Control Measures		
		Warehouse loading/unloading is under roof		
		Fuel loading/unloading conducted by trained personnel		
		Fuel oil ASTs are diked		
4581	Transportation	Discontinued use of toxic materials/ practices on runway during training exercises		
		Monitor storm water discharge under VPDES permit		
		Lining of storm drain piping with polymer coating		
		Leak detection systems at fuel farm and gas station		
		Fuel storage and incidents covered by ICP		
		Oil/water separator at storm drain serving fuel farm		
		On-site emergency response HazMat Teams		
		Oil/water separator at airplane wash rack		
		Sorbent boom located downstream from outfall 003		
	Space Vehicles	Under roof (Payload Processing Facility)		
3460	Parts Manufacturing	Reduced toxicity of materials (solvents F-7, F-10)		
		Good housekeeping practices		
	Scrapyard at N-222	No conveyance		
		Restricted materials storage		
		Good housekeeping practices		
	Construction/ Demolition/ Restoration	Best Management Practices		
		Soil Erosion and Sediment Control		
9661	Space Technology/	Laminar flow		
	Research	No conveyances		

4.2 Good Housekeeping and Preventive Measures

Source control measures have been implemented for the industrial activities subject to storm water.

4.2.1 Airport Fueling Operations

Source controls for these operations include:

- 1. Daily fuel truck inspections to check tanker integrity and mechanical functions.
- 2. Monthly inspection/maintenance of oil/water separators at fuel farm and wash rack.
- 3. Fueling and wash rack areas maintained in a clean, orderly manner.
- 4. Monitoring of fueling operations by trained personnel.

4.2.2 Airport Runways

Runways are a secondary source of pollutants and are maintained to reduce runoff potential. Maintenance activities include:

- 1. Daily inspections by the Fire Department.
- 2. Sweeping and vacuuming surfaces as needed.
- Maintenance of grass buffer zones between runways and storm water catch basins to intercept any loose debris and sediment not removed by airport maintenance.

4.2.3 Waste Collection

Major solid waste streams on WFF include domestic refuse, hazardous wastes, used oil, and recyclables. To ensure proper handling, the Environmental Office performs Annual RCRA Generator training for Satellite Accumulation Area points of contact. To encourage proper disposal, the Environmental Office provides collection, transportation, and storage of used or discarded hazardous wastes prior to final disposal through a permitted treatment, storage, and disposal facility. Training, coupled with this service, helps reduce the potential for releases from these waste streams. The WFF routinely provides hazardous wastes management and disposal services for all the WFF partners at the Main Base and Wallops Island.

4.2.4 Fueling Operations

Trained personnel monitor fueling operations for facility heating and emergency generator equipment. Plant operations or logistics personnel monitor on-site fuel loading to ensure that proper procedures are followed. Aboveground storage tanks are surrounded by secondary containment and inspected periodically for precipitation accumulation or product release. If uncontrolled spills or leaks of hazardous substances occur, the Wallops Fire Department must be notified immediately. The Environmental Office notifies DEQ within 2 hours if greater than 25 gallons (94.6 liters) of fuel spills onto the ground or cause a sheen on surface waters. Once the spill is contained, the Environmental Office submits an incident report to DEQ.

4.2.5 Drum Storage

The Environmental Office has actively sought to reduce the pollution potential from outdoor drum storage and loading activities by moving the majority of these activities under shelter. An inventory of exposed materials is presented above in Section 3.2. Outdoor drum storage at Building B-130 is infrequent and temporary. Moreover, when drums are stored outdoors, they are kept underneath a trailer, thereby limiting exposure to storm water. Drums of used jet fuel, JP-5, are stored outdoors at the Aviation Fuel Tank Farm. All storm drainage at this location passes through the oil/water separator identified as intermediate outfall 302.

4.2.6 Personal Vehicle Washing

Both the Navy and the Coast Guard maintain housing facilities for personnel stationed at Wallops Island and Chincoteague, respectively. Personnel living at these facilities are authorized to wash personal vehicles at their residences. Currently, no designated wash areas have been established. Therefore, WFF encourages its partners to instruct their personnel to not wash vehicles near storm drains but rather on grassy areas using biodegradable detergents.

4.3 Preventive Maintenance

The Logistics Branch performs biannual preventive maintenance on all government owned vehicles and equipment. Logs are retained by the Branch. All contractor-owned vehicles and equipment are required to have periodic preventive maintenance in order to be used on the facility. Records are maintained by the contractor. Ground Networks performs and tracks daily, weekly, monthly, quarterly, and annual preventive maintenance on all radar and antenna systems on the facility. Following the ICP Work Instructions, the Facilities Management Branch periodically drains the secondary containment areas for the ASTs. The FMB also performs biannual preventive maintenance on all government owned large machinery (e.g., cranes, front end loaders, earth movers).

4.4 Spill Prevention and Response Procedures

The current ICP delineates the spill prevention, response, and cleanup procedures. These procedures are utilized in the event of a spill. Contractor personnel provide on-site fire, emergency, and hazardous material (HazMat) response services to the WFF. Spill response kits are located in major industrial areas such as satellite accumulation areas, 90-day hazardous waste storage buildings, vehicle maintenance garages, and airport hangars.

The ICP must identify and address the response to a realistic Worst Case Scenario (as defined by 9 VAC 25-91-170.11). It was theorized that the worst case might involve the rupture of either the fuel hose or tank of an aircraft fueling tanker while it is on the apron of the tarmac. The largest tanker has a capacity of 6,000 gallons (20,760 liters) and a fueling rate of 100 gallons per minute (gpm) or 346 liters per minute (lpm). At regular grid intervals, storm water inlets are inlaid in the apron of the runway. The inlets are interconnected by the storm water piping and drain to outfalls around the runway. Many of these outfalls lead to bodies of surface water. Therefore, if a tanker were to rupture on the apron, a potential release of 6,000 gallons (20,760 liters) of fuel oil could enter the surface waters of the Commonwealth (see Figure 3). Aircraft fueling operations occur at two locations on the facility: the east ramp of Hangar D-1 and the east ramp of Hangar N-159, with 75 percent of the fueling occurring at Hangar D-1 and 25 percent occurring at Hangar N-159. In order to support this theory, the Environmental Office conducted a simulated spill exercise on the runway apron east of Hangar D-1. Results and details of the simulated spill exercise are included in the ICP.

4.5 Inspections

The current VPDES permit requires WFF to perform quarterly visual inspections of its 12 permitted storm water outfalls. A condition of this SWP3 requires WFF to perform quarterly inspections of high risk areas (as listed above in Table 3, Inventory of Materials Exposed to Precipitation) and to perform an annual Comprehensive Site Compliance Evaluation (CSCE) to determine if activities at or near storm water discharge points have the potential of polluting or negatively impacting waters of the Commonwealth. As a part of the CSCE, the Wallops Environmental Team also inspects all storm water drop inlets annually. Appendix B contains blank inspection forms. All findings and recommendations are reported immediately to the appropriate department for corrective action (e.g., Facilities Management Branch, Logistics).

Under conditions of the ICP, the Environmental Office also performs annual inspections on all AST systems and any other vessel that could contain 55 gallons or more of any animal, vegetable, mineral, or petroleum based oil. Appendix B contains blank inspection forms. All findings and recommendations are reported immediately to the appropriate department for corrective action (e.g.., Facilities Management Branch, Logistics).

The Logistics Branch performs the following: daily inspections of the Mobile Tanker Storage Area and of the mobile tankers, daily meter readings reconciled against biweekly stick-tests of the gasoline and diesel USTs at the F-26 gas station, and daily readings of the computer monitoring system at the D-37 aircraft fuel farm reconciled against monthly delivery receipts. The FMB performs visual inspections on the two 125,000 gallon Number 6 fuel oil ASTs and the two 20,000 gallon Number 2 fuel oil ASTs during every shift change (i.e., twice daily) as well as periodic visual inspections and draining of the secondary containment for all ASTs on the facility. Both the wash rack and the fuel tank farm oil/water separators are inspected monthly and emptied when necessary. The Facilities Management Branch maintains inspection records for these separators.

Sediment and erosion control structures are inspected by FMB as detailed below. All inspection logs are retained by FMB and the Environmental Office.

Spill response equipment is inspected for contents, condition, and availability. This equipment is maintained in the Fire Department Building B-129 and the Hazardous Waste Storage Building B-29. The Fire Department and the Environmental Office personnel, respectively, conduct inspections.

4.6 Employee Training

The WFF maintains a staff trained in the use of the ICP, spill response, materials management practices, and HAZWOPER procedures. Table 10 lists the training events, number of personnel attending, and the frequency of event.

TABLE 10 TRAINING EVENTS AND FREQUENCY OF ATTENDANCE			
Training Program	Frequency		
HAZMAT I	Every 5 years		
HAZMAT II	Every 5 years		
HAZMAT III	Every 5 years		
EPA Spill Response & Boom Recovery	1 time		
OSHA HAZWOPER Refresher	Annual		
RCRA Update	Annual		
RCRA Loading Dock Training	Ongoing (at least annual)		
ICP Training	Annual		
Hazardous Materials Awareness	1 time		
Hazardous Materials Operation	Every 5 years		
Fire Department Continuing Education	Monthly		

The WFF maintains a staff trained in the use of the ICP, spill response, materials management practices, and HAZWOPER procedures. The training program for the ICP incorporates storm water management and pollution prevention. Training is conducted annually and covers spill response, good housekeeping measures, and materials management. Facilities maintenance, environmental, logistics, aircraft operations, fire department, radar maintenance, and personnel involved in the maintenance and use of the storage tanks attend this training.

4.7 Recordkeeping and Internal Reporting Procedures

The ICP delineates internal and external incident reporting requirements. All incidents must be reported to the WFF Fire Department. The WFF Fire Department logs all incidents reports and sends a copy to the Environmental Office. All reportable quantity spill response and remediation files are maintained by the Environmental Office.

The Environmental Office conducts quarterly visual inspections of the 12 permitted storm water outfalls, quarterly inspections of high risk areas (areas exposed to precipitation as identified above in Table 2) and an annual visual inspection of all storm water drop inlets. These inspections are compiled into the annual CSCE report and filed with this Plan. Copies of the monthly discharge monitoring reports are also filed with this Plan; original reports are held by the WFF Chemical Analysis Laboratory. The Logistics Branch, Facilities Management Branch, and Ground Networks maintain all records and logs as described above. Sediment and erosion control structures are inspected by FMB as detailed below. All inspection logs are retained by FMB and the Environmental Office.

4.8 Sediment and Erosion Control

The WFF is located on the Atlantic Coastal Plain of Virginia and occupies an area with elevations ranging from sea level to approximately 40 feet (12.2 meters) above sea level. Buildings are located on flat or gently sloping grades (0-2 percent). The WFF perimeters have occasional incised streambeds or embankments on the tidal fringe. Most of the site is not highly erodible, however its proximity to wetlands and its elaborate storm drainage system (a direct conduit to surface waters) elevate the risk of storm water pollution from land disturbing activities.

NASA has a formal process in place to ensure that new construction at WFF has a minimal impact on surface water resources and that all applicable permits and regulatory controls are in place. This process is depicted in the flow chart below. If a land disturbing activity disturbs at least 10,000 square feet (930 square meters) or presents an elevated risk of storm water pollution, an Erosion and Sediment Control Plan is prepared and submitted to the WFF Environmental Office for approval. Current BMPs employed for storm water management and erosion and sediment control include installing silt fences, utilizing stone construction vehicle entrances, maintaining vegetative buffer strips, and quickly reseeding bare soils. All Plans and applicable BMPs are consistent with the Virginia Erosion and Sediment Control Program, which is administered by the Virginia Department of Conservation and Recreation (DCR). Furthermore, any of these activities that impact at least 1 acre (0.40 hectare) require coverage under a *Virginia Storm Water Management Program (VSMP)* permit issued by the Virginia DCR (effective 1/29/2005).

NASA currently holds *VPDES General Permit for Storm water Discharges from Construction Sites*, VAR104417, which expires June 30, 2009, for land disturbing activities on the Mainland/Island facilities. An SWP3 has been prepared for this permit and is updated as needed to include each active construction, demolition, or restoration project on the Mainland and Island facilities. A copy of this plan is available for inspection at each active land disturbing activity operating under the permit. The SWP3 for the Construction Permit mandates that FMB inspectors evaluate sediment and erosion control practices and controls every 14 calendar days or within 48 hours of a runoff producing storm event. Any deficiencies or discrepancies must be repaired within 7 calendar days. All inspection logs are maintained by FMB and the Environmental Office. The Environmental Office is currently preparing the application and SWP3 for a *DCR VSMP* permit for the WFF Main Base facility.

4.9 Management of Runoff

Storm water inlets on the Main Base intercept runoff and divert the flow to numerous discharge locations (see Figure 2). Wallops Main Base controlled storm water is discharged through outfalls numbered 001 – 014 (see Figure 3), with the exception of outfalls 002 and 011 that are located on Wallops Island. In addition to the storm water management system, as outlined above in Section 4.8, sediment and erosion control measures are implemented to control runoff from construction, demolition, restoration, and site maintenance projects. No settling ponds are employed on the facility.

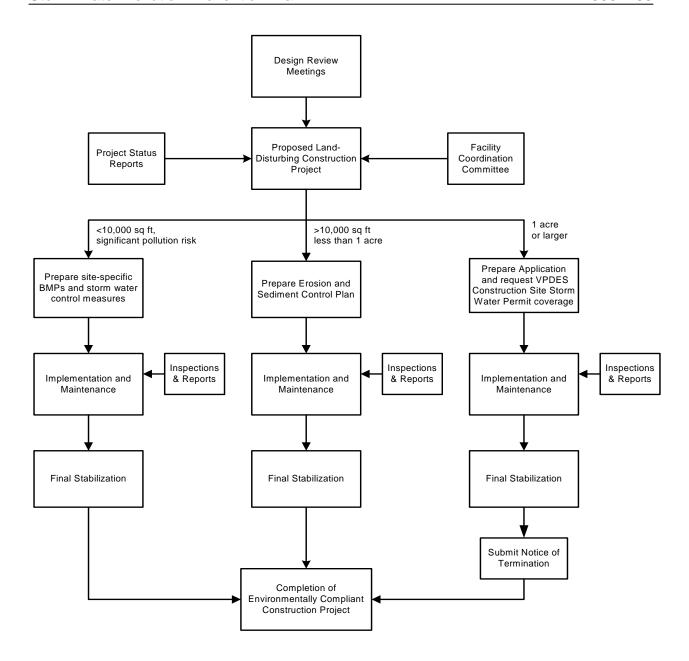


CHART 1

Process for Minimizing Environmental Impacts from Proposed Land-Disturbing
Activities

5.0 COMPREHENSIVE SITE COMPLIANCE EVALUATION

The WFF conducts multiple inspections of industrial areas located within its storm water drainage areas (see Figure 2). The inspection criteria are fully detailed in the ICP. Inspections are completed by qualified personnel and duly documented in a compliance evaluation report. Features inspected include storm water catch basins within industrial and storage locations, storm water outfalls associated with potential pollutant sources, oil/water separator functions, potential pollutant storage location and risk identification, sediment and erosion control measures, and spill response equipment. The SWPPT reviews the CSCE Report and recommends and implements any necessary corrective actions.

Annually, Environmental Office personnel visually inspect storm water inlets for flow, debris, integrity of the conveyance, and overall operation.

Quarterly, Environmental Office personnel visually inspect storm water catch basins and outfalls. These units are inspected for flow, debris, integrity of the conveyance, and overall operation. Catch basins are located in fuel storage and industrial locations.

Quarterly, the Environmental Office inspects high risk potential pollutant storage locations. Drum storage and integrity of storage containers are observed and noted. Potential risks to the storm water conveyances are noted and alternatives assessed. Locations are inspected for unreported containment failures.

Comprehensive Site Compliance Evaluation reports are prepared annually and maintained by the Environmental Office and filed with this SWP3. Any necessary revisions to this SWP3 will be made within 14 days of the compliance report. Corrections will be implemented no later than 90 days following an inspection.

6.0 CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

(Signature)	(Date)
(Printed Name and Title)	
ffice Name, Address, and Telephone Nu	mher)

APPENDIX A

DISCHARGE MONITORING REPORT (DMR) FOR PERMIT #VA0024457 **APPENDIX B**

INSPECTION FORMS